

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Robert Holt, et al. v. National Football  
League, et al. (Plaintiffs Carl Lee, III and  
Donna Marie Lee ONLY)

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFFS CARL LEE, III  
AND DONNA MARIE LEE**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiff's Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Carl Lee, III and Donna Marie Lee only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Carl Lee, III and Donna Marie Lee.

2. Plaintiffs' counsel filed a short form complaint for Carl Lee, III and Donna Marie Lee on August 17, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Carl Lee, III, Donna Marie Lee, and the undersigned.

4. Plaintiffs' counsel properly notified Carl Lee, III and Donna Marie Lee of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Carl Lee, III and Donna Marie Lee only in Court File No. 2:12-cv-4185-AB.

Dated: August 15, 2018

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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J. Gordon Rudd, Jr. (#222082)

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